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U.S. DISTRICT COURT E.D.N.Y.

★ SEP 27 2013 ★

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

-----X  
BWP Media USA Inc d/b Pacific Coast News

ANSWER

Plaintiff,

Case No. CV-13-4448

-against-

Judge : FEUERSTEIN, J

Continental Connections Co.Inc

Defendant

-----X

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ADMISSIONS AND DENIALS

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- (1) In the section tagged "Introduction" on paragraph No. 3, the allegation by plaintiff that Continental Connections Co.Inc owns and operates a website known as www.thisbangladesh.com is not true as the plaintiff Continental Connections Co.Inc does not own and operate www.thisbangladesh.com.
- (2) In the section tagged "Introduction" on paragraph No. 5, the plaintiff alleges that Continental Connections Co.Inc copied, modified, and displayed BWP's photograph on Continental Connections Co.Inc's website ; this is not true as Continental Connections Co.Inc does not own and operate www.thisbangladesh.com
- (3) In the section tagged "Introduction" on paragraph No. 6, the plaintiff alleges that Continental Connections Co.Inc engaged in this misconduct knowingly and in violation of United States copyright laws does not hold as www.thisbangladesh.com does not belong to Continental Connections Co.Inc.
- (4) In the section tagged "Introduction" on paragraph No. 7, the plaintiff alleges Continental Connections has substantially harmed BWP does not hold as Continental Connections Co.Inc does not own and operate www.thisbangladesh.com.
- (5) In the section tagged "Parties" on paragraph No.12, the allegation by plaintiff that Continental Connections Co.Inc is a corporation with a principal place of business in Kings County, New York is true but Continental Connections Co.Inc is not liable and responsible to the Plaintiff based on the fact that Continental Connections Co.Inc does not own and operate www.thisbangladesh.com
- (6) In the section tagged "Continental Connections Co., inc's website" on paragraph No. 20, the allegation by the Plaintiff that on information and belief,

that Continental Connections Co.Inc is the registered owner of the website located at [www.thisbangladesh.com](http://www.thisbangladesh.com)(the website) and operates the websites is not true as Continental Connections Co.Inc does not own and operate [www.thisbangladesh.com](http://www.thisbangladesh.com) and it is therefore not responsible in anyway whatsoever the content thereon;

- (7) In the section tagged “ Continental Connections Co., inc’s website on paragraph no 22, the allegation by the Plaintiff that Continental Connections Co.Inc profits from paid advertisement on [www.thisbangladesh.com](http://www.thisbangladesh.com) is not true as Continental Connections Co.Inc does not own and operate [www.thisbangladesh.com](http://www.thisbangladesh.com);
- (8) In the section tagged “ Continental Connections Co., inc’s misconduct on paragraph no 23”, the allegation by the plaintiff that without permission or authorization from BWP that Continental Connections Co.Inc copied, modified, and / displayed the Photographs on the website at [www.thisbangladesh.com](http://www.thisbangladesh.com) cannot be true as Continental Connections Co.Inc does not own and operate [www.thisbangladesh.com](http://www.thisbangladesh.com) ;
- (9) In the section tagged “ Continental Connections Co., inc’s misconduct on paragraphs Nos. 24, 25,26,27,and 28 does not have any significant base Continental Connections Co.Inc does not publish [www.thisbangladesh.com](http://www.thisbangladesh.com) and cannot possibly have received any financial benefits whatsoever from [www.thisbangladesh.com](http://www.thisbangladesh.com).
- (10) In the section tagged “ Continental Connections Co., inc’s misconduct in paragraph No. 33, the allegation by Plaintiff that on information and belief, without permission or authorization from BWP and in willful violation of BWP’s rights under 17 U.S.C 106, is not true as Continental Connections. Co.Inc does not operate and own [www.thisbangladesh.com](http://www.thisbangladesh.com)
- (11) In the section tagged “ Continental Connections Co., inc’s misconduct in paragraph No. 34, the allegation by the plaintiff that Continental Connections Co.Inc’s reproduction of the photograph and display of the photograph on [www.thisbangladesh.com](http://www.thisbangladesh.com) is not worthy of any consideration as Continental Connections Co.In does not own and operate [www.thisbangladesh.com](http://www.thisbangladesh.com)
- (12) In the section tagged “ Continental Connections Co., inc’s misconduct in paragraph No. 35, the allegation by the plaintiff that On Information and belief, thousands and people have viewed the unlawful copies of the photographs on the website does not deserve any consideration as Continental Connections Co.Inc does not own and operate [www.thisbangladesh.com](http://www.thisbangladesh.com)
- (13) In the section tagged “ Continental Connections Co., inc’s misconduct in paragraph No. 36, the allegation by the plaintiff that on information and belief, Continental Connections Co.Inc had the knowledge of the copyright infringement and had the ability to stop the reproduction and display of BWP’s copyright material does not hold water as Continental Connections Co.Inc does not own and operate [www.thisbangladesh.com](http://www.thisbangladesh.com)
- (14) In the section tagged “ Continental Connections Co., inc’s misconduct in paragraph No. 37, the allegation by the plaintiff that Continetal Connections Co.Inc’s copyright infringement has damaged BWP in an amount to be proven at trial does not deserve any serious consideration as Continental Connections Co.Inc does not own and operate [www.thisbangladesh.com](http://www.thisbangladesh.com)

**PRAYER FOR RELIEF**

Continental Connections hereby requests that the entire case be thrown out as Continental Connections Co.Inc does not own and operate [www.thisbangladesh.com](http://www.thisbangladesh.com) and cannot have possibly derive any kind of financial benefits whatsoever from an entity that it does not own ; BWP should do necessary research to know the owner of [www.thisbangladesh.com](http://www.thisbangladesh.com)

**II**  
**DEFENSES**

*In this section, state any legal theories that, even assuming that what plaintiff has alleged in the complaint is true, do not permit the plaintiff to win the case. Attach additional sheets of paper as necessary.*

FIRST DEFENSE:

Continental Connections Co. Inc

SECOND DEFENSE:

THIRD DEFENSE:

**WHEREFORE** defendant asks this Court to dismiss the complaint and enter judgment in favor of defendant.

*[If you have any counterclaim against the plaintiff that arises out of the same events or transactions stated in the complaint, and/or any crossclaims against the other defendants that arise out of the same events or transactions stated in this complaint, and/or any third-party claims you have against third-parties (that is, someone not already named in the lawsuit) that arise out of the same events or transactions stated in the complaint, you should attach additional sheets of paper to set forth the facts and bases for any such claims. See the Pro Se Manual for a further explanation.]*

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 9-20-13

AdRascq  
SIGNATURE

Rascq R.  
PRINTED NAME

333 Lafayette Ave # 6B  
PRESENT ADDRESS

Brooklyn, NY 11238

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

BWP Media U.S.A Inc d/b  
Pacific Coast News

Plaintiff,

Affirmation of Service

-against-

Continental Connections Co. Inc

Defendant.

CV (13) 4448

I, Rasag Rasag, declare under penalty of perjury that I have  
served a copy of the attached Admissions and Denials  
upon Sanders Law PLLC  
whose address is: 100 Garden City Plaza, Suite 500  
Garden City, NY 11530

Dated: 9.24-13  
New York

ARasag  
Signature  
333 Lafayette Ave #6B  
Address  
Brooklyn, NY 11238  
City, State, Zip Code

Continental Connections Co. Inc  
333 Lafayette Ave #68  
Brooklyn NY 11238

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Office of the Clerk  
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11722-4438